

**EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET
SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230**

**BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196**

MEMO ENDORSED

November 17, 2020

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Filed on ECF

The application is X granted
 denied


Edgardo Ramos, U.S.D.J.

Dated: 11/19/2020

New York, New York

Re: *United States v. Rolando Heredia*
20 Cr. 238 (ER)

Dear Judge Ramos:

We represent the defendant Rolando Heredia under the Criminal Justice Act (“CJA”). We write this letter to respectfully seek the Court’s permission to file an interim voucher.

As Your Honor may recall, the single count indictment in this case charges Mr. Heredia with being a felon in possession of ammunition under the ACCA provisions of 18 U.S.C. § 924(e), which carries a 15-year mandatory minimum. Since we were appointed in this matter in January 2020, we have put in considerable time researching various issues -- including whether defendant’s prior convictions qualify as ACCA predicates (an issue that is not clear cut in this situation), reviewing the discovery (which is sizeable), and meeting by phone and video conference with Mr. Heredia on a regular basis, among other things.

In April 2020, Chief Judge McMahon had issued an order in light of the COVID-19 pandemic allowing CJA attorneys in this District to submit interim vouchers without seeking individual orders. Since such order expired on September 30, 2020, we now seek permission from the Court for us to file an interim voucher at this time.

Respectfully submitted,

Sarah M. Sacks